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Attorneys for GMAC MORTGAGE, LLC

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA - OAKLAND DIVISION

In re

KATIE RUTH DAVIS,

Debtor.

Case No. 11-44461

Chapter 13

**GMAC MORTGAGE, LLC'S REQUEST
FOR SPECIAL NOTICE AND SERVICE
OF PAPERS AND RESERVATION OF
RIGHTS**

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR, AND ALL
INTERESTED PARTIES

PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys for
GMAC Mortgage, LLC hereby requests special notice of all events relevant to the above-referenced
bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced
bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule
2002, the commencement of any adversary proceedings, the filing of any requests for hearing,
objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters
which must be noticed to creditors, creditors committees and parties-in-interest and other notices as
required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-
referenced bankruptcy court.

1 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the
2 Master Mailing List in this case, the following address be used:

3 Eddie R. Jimenez
4 PITE DUNCAN, LLP
4375 Jutland Drive, Suite 200
5 P.O. Box 17933
San Diego, CA 92177-0933

6 Neither this Request for Special Notice nor any subsequent appearance, pleading,
7 claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a
8 waiver of the within party's:

9 a. Right to have any and all final orders in any and all non-core matters entered
10 only after de novo review by a United States District Court Judge;

11 b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the
12 instant proceeding by Fed. R. Bankr. P. 7004, notwithstanding Pite Duncan, LLP's participation in
13 the instant proceeding. This Request for Special Notice shall not operate as a confession and/or
14 concession of jurisdiction. Moreover, the within party does not authorize Pite Duncan, LLP, either
15 expressly or impliedly through Pite Duncan, LLP's participation in the instant proceeding, to act as
16 its agent for purposes of service under Fed. R. Bankr. P. 7004;

17 c. Right to trial by jury in any proceeding as to any and all matters so triable
18 herein, whether or not the same be designated legal or private rights, or in any case, controversy or
19 proceeding related hereto, notwithstanding the designation or not of such matters as "core
20 proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to
21 statute or the United States Constitution;

22 d. Right to have the reference of this matter withdrawn by the United States
23 District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

24 e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters
25 to which this party is entitled under any agreements at law or in equity or under the United States
26 Constitution.

27 Dated: May 12, 2011

28 PITE DUNCAN, LLP
/s/ Eddie R. Jimenez (SBN 231239)
Attorneys for GMAC MORTGAGE, LLC

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on May 12, 2011 Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

DEBTORS

Katie Ruth Davis
209 Market Avenue
Richmond, CA 94801

DEBTORS' ATTORNEY
(via electronic notice)

Patrick L. Forte
Law Offices of Patrick L. Forte
1 Kaiser Plaza #480
Oakland, CA 94612-3610

TRUSTEE
(via electronic notice)

Martha G. Bronitsky
P.O. Box 5004
Hayward, CA 94540-5004

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on May 12, 2011, at San Diego, California.

/s/ Mary K. Arnold
MARY K. ARNOLD